

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CITY OF LAKELAND EMPLOYEES) Case No. 1:10-cv-06016
PENSION PLAN, Individually and on Behalf)
of All Others Similarly Situated,) CLASS ACTION
Plaintiff,) Judge John J. Tharp, Jr.
vs.)
BAXTER INTERNATIONAL INC., et al.,)
Defendants.)

LEAD PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

1. Lead Plaintiff National Elevator Industry Pension Fund hereby moves the Court for entry of an Order: (1) preliminarily approving the Settlement Agreement dated August 11, 2015; (2) certifying the Class for settlement purposes; (3) approving the form and method for providing notice of the settlement to Class Members; and (4) scheduling a final Settlement Hearing.

2. This motion is based upon the Settlement Agreement and all Exhibits attached thereto, the Memorandum of Points and Authorities in Support of Lead Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement, the Declaration of Peter Crudo Regarding Notice and Administration, the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice ("Notice Order"), all other pleadings and matters of record, and such additional evidence or argument as may be presented at the hearing.

Accordingly, Lead Plaintiff requests that the Court enter the Notice Order, a copy of which is attached hereto.

DATED: August 11, 2015

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
ROBERT J. ROBBINS
BAILIE L. HEIKKINEN
KATHLEEN B. DOUGLAS
HOLLY W. KIMMEL
JANINE D. ARNO

s/ Robert J. Robbins

ROBERT J. ROBBINS

120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
SPENCER A. BURKHOLZ
TOR GRONBORG
JONAH H. GOLDSTEIN
JASON A. FORGE
JEFFREY D. LIGHT
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Lead Plaintiff

MILLER LAW LLC
MARVIN A. MILLER
MATTHEW E. VAN TINE
LORI A. FANNING
115 S. LaSalle Street, Suite 2910
Chicago, IL 60603
Telephone: 312/332-3400
312/676-2676 (fax)

Liaison Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 11, 2015.

s/ Robert J. Robbins
ROBERT J. ROBBINS

ROBBINS GELLER RUDMAN
& DOWD LLP
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

E-mail: rrobbins@rgrdlaw.com

Mailing Information for a Case 1:10-cv-06016 City of Lakeland Employees Pension Plan v. Baxter International Inc. et al**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

- **Janine D Arno**
e_file_sd@rgrdlaw.com,e_file_fl@rgrdlaw.com
- **James E Barz**
jbarz@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Spencer A Burkholz**
spenceb@rgrdlaw.com
- **Kathleen Barber Douglas**
kdouglas@rgrdlaw.com,e_file_sd@rgrdlaw.com,e_file_fl@rgrdlaw.com
- **Lori Ann Fanning**
LFanning@MillerLawLLC.com,MMiller@MillerLawLLC.com,ajewell@millerlawllc.com,drobinson@millerlawllc.com,JRamirez@millerlawllc.com
- **Jason Adeeb Forge**
jforge@rgrdlaw.com,E_File_SD@rgrdlaw.com,tholindrake@rgrdlaw.com
- **Michael Jerry Freed**
mfreed@fkmlaw.com,mkhamoo@fkmlaw.com
- **Andrew J Fuchs**
afuchs@skadden.com,chdocket@skadden.com
- **Jonah Harry Goldstein**
jonahg@rgrdlaw.com
- **Tor Gronborg**
torg@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Matthew Thomas Heffner**
mheffner@heffnerhurst.com,mhurst@heffnerhurst.com
- **Bailie Heikkinen**
bheikkinen@rgrdlaw.com
- **Steven A Kanner**
skanner@fkmlaw.com
- **Holly Wiseberg Kimmel**
hkimmel@rgrdlaw.com
- **Matthew Robert Kipp**
mkipp@skadden.com,chdocket@skadden.com
- **Leigh R. Lasky**
lasky@laskyrikkind.com
- **Jeffrey D. Light**
jeffl@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Donna L. McDevitt**
dmcdevit@skadden.com,chdocket@skadden.com
- **Marvin Alan Miller**
Mmiller@millerlawllc.com,ajewell@millerlawllc.com,LFanning@millerlawllc.com,drobinson@millerlawllc.com,JRamirez@millerlawllc.com
- **Amelia Susan Newton**
newton@laskyrikkind.com
- **Norman Rifkind**
rifkind@laskyrikkind.com
- **Robert J. Robbins**
rrobbins@rgrdlaw.com,e_file_sd@rgrdlaw.com,cthornton@rgrdlaw.com,hkimmel@rgrdlaw.com,e_file_fl@rgrdlaw.com,ckent@rgrdlaw.com
- **Donald Lewis Sawyer**
dsawyer@fkmlaw.com,mkhamoo@fkmlaw.com

- **Judith S. Scolnick**
jscolnick@scott-scott.com,mschwartz@scott-scott.com,efile@scott-scott.com,aslaughter@scott-scott.com
- **Martin Vincent Sinclair**
martin.sinclair@skadden.com
- **Matthew E Van Tine**
mvantine@millerlawllc.com,mvt@vantine.us

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)